

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

Yolany PADILLA, *et al.*,

Plaintiffs,

v.

U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT, *et al.*,

Defendants.

Case No. 18-cv-0928 MJP

**DECLARATION OF PRIYA
A. PATEL IN SUPPORT OF
PLAINTIFFS' AMENDED
MOTION FOR CLASS
CERTIFICATION**

I, Priya A. Patel, hereby declare:

1. I am an attorney licensed to practice law in California. My business address is: 1612 K Street NW, Suite 204, Washington, DC 20006. I am admitted to practice in the Supreme Court of California.
2. I have been practicing immigration law for over 5 years. Currently, I am a Senior Staff Attorney at the Capital Area Immigrants' Rights Coalition. My practice primarily involves assisting immigrants detained in Maryland. I represent individuals before the Arlington Asylum Office, the Baltimore and Arlington Immigration Courts, and the Board of Immigration Appeals.
3. I regularly enter appearances on behalf of individuals who have expressed a fear of return to their country of origins or an intention to apply for asylum to officials in the Department of Homeland Security. These individuals have credible fear proceedings before the Asylum Office in U.S. Citizenship and Immigration Services. In my

1 experience, the Asylum Office routinely fails to conduct a credible fear interview within
2 10 days after my individuals have requested asylum or expressed a fear of return.

3 Almost always, individuals must wait 3-4 weeks for the interview to take place. In one
4 case, an individual waited 45 days before the Asylum Office conducted a credible fear
5 interview.

6
7 4. I assist detained individuals whom an asylum officer has determined have a credible
8 fear of return to their country of origin, who initially entered the country without
9 inspection, and who are eligible for release from immigration custody. These
10 individuals are served Notices to Appear at the Baltimore Immigration Court. These
11 individuals regularly wait more than 7 days, and at times up to 45 days, for a bond
12 hearing.

13
14 5. I have never had a client receive written bond decisions from immigration judges with
15 particularized findings unless they file an appeal with the Board of Immigration
16 Appeals. When the immigration judge issues a decision in these cases, it is on a
17 Custody Order of the Immigration Judge form.

18 I declare under penalty of perjury of the laws of the District of Columbia and the United States
19 that the foregoing is true and correct to the best of my knowledge and belief. Executed the 6th
20 day of September 2018 in Washington, D.C..

21
22 By:


23 _____
24 Priya A. Patel
25
26

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2018, I filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system. All other parties shall be served in accordance with the Federal Rules of Civil Procedure.

DATED this 6th day of September, 2018.

s/ Glenda M. Aldana Madrid

Glenda M. Aldana Madrid

NORTHWEST IMMIGRANT RIGHTS PROJECT

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